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67,097-027; 10863

REMARKS


Applicant has amended this application in response to the office action.

The claims stand rejected over the Wang, et al. patent. Wang, et al. does disclose three fluid jets, however, these jets rotate to form one hole. Essentially, this device is for drilling a hole in a rock. The Wang, et al. device does not form a "plurality of holes" after the fluid jets break through the target location. First, there is arguably never "break-through" in Wang, in that it is simply drilling further into the earth. However, to the extent there is "break-through," a single hole is formed, as each of the nozzles form concentric grooves. Mechanical cutters remove the rock from between these grooves. Thus, what is formed is "grooves" and not holes at all. A hole by definition is a hollow shape having a boundary. Wang, et al. does not disclose forming holes, and would not form a plurality of holes.

Certainly, the limitations added by dependent claims 24 and 25 are not met by Wang, et al.

Fees for two additional dependent claim may be charged to Deposit Account No. 21-0279 in the name of United Technologies Corporation. Applicant believes that no additional fees are necessary, however, the Commissioner is authorized to charge the same deposit account for any additional fees or credit the account for any overpayment.

Respectfully submitted,



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CERTIFICATE OF TRANSMISSION UNDER 37 CFR 1.8

I hereby certify that this correspondence is being facsimile transmitted to the United States patent and Trademark Office, fax number (703) 872-9306, on October 6, 2006.



Laura Combs

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